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PLEASE RESPOND TO CLEVELAND OFFICE

August 27, 2014

E-Mail: bartk@cooperelliott.com

Barton R. Keyes
Cooper & Elliott
2175 Riverside Drive
Columbus, Ohio 43221

RE: **David Catanzaro v. Seaman Group, LLC**
USDC, ND of Ohio, Eastern Division
Case No. 1:13-cv-996-DAP, Judge Polster
GS File No.: 97441-122160

Dear Bart:

I write to follow-up on the discussions held during the August 20, 2014 status conference as summarized in the Court's minutes of proceedings journalized on August 21.

Pursuant to the Judge's ruling, I ask that you please provide Mr. Catanzaro's tax returns from 2007 to the present as soon as possible. I assume that the produced documents will include all federal, state, and local returns for the pertinent years along with all associated schedules. We are certainly amenable to an agreed-to protective order if you would like to draft the same.

Judge Polster also indicated that if your client persists in maintaining his clam for emotional distress he must produce relevant medical and psychological records. Please provide a list of Mr. Catanzaro's medical and psychological care providers for the past seven years. To facilitate this process, enclosed with this letter is a standard record release form. Please have your client execute the same for each medical and psychological care provider and return the executed copies to my office. If your client has decided to drop his emotional distress claim, your written confirmation of the same will render the need for the releases moot. As with the tax returns, we are amenable to agreed-to protective order with regard to the records.

Finally, I ask that you confirm that you and your client are available the week of October 6 for deposition.

If you have any questions or would like to discuss any of the foregoing in more detail, feel free to contact me at your convenience.



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Very truly yours,

Shane A. Lawson

Shane A. Lawson

SAL/sad

Enclosure

cc: Tom Mazanec (Via E-Mail: tmazanec@mrrlaw.com)

Elaine Tso (Via E-Mail: etso@mrrlaw.com)

Monica A. Sansalone